

U.S. DISTRICT COURT
N.D. OF N.Y.

**UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF NEW YORK**

APR 19 2017

• 445 Broadway; Albany, NY 12207-2936 • ALBANY

LAWRENCE K. BAERMAN, CLERK

Unified United States Common Law Grand Jury¹

Sureties of the Peace²

P.O. Box 59, Valhalla, NY 10595; Fax: (888) 891-8977.

AL, AK, AZ, AR, CA, CO, CT, DE, FL, GA, HI, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY:

Grand Jury, Sovereigns of the Court
We the People

- Against -

Governor A. Cuomo, et al
(complete list attached to summons)

Defendants

Jurisdiction: Court of Record, under
the rules of Common Law³

Case NO: 1:16-CV-1490

Magistrate: Daniel J. Stewart

**MEMORANDUM OF LAW IN
SUPPORT OF STANDING**

In the United States, the current doctrine is that a person cannot bring a suit challenging the constitutionality of a law unless the plaintiff can demonstrate that (s)he is or will "imminently" be harmed by the law. Otherwise, the court will rule that the plaintiff "lacks standing" to bring the suit, and will dismiss the case without considering the merits of the claim of unconstitutionality.

¹ The UUSCLGJ is comprised of fifty Grand Jurys each unified amongst the counties within their respective States. All fifty States have unified nationally as an assembly of Thousands of People in the name of We the People to suppress, through our Courts of Justice, subverts both foreign and domestic acting under color of law within our governments. States were unified by re-constituting all 3,133 United States counties.

² **SURETIES OF THE PEACE:** If anyone has been dispossessed without the legal judgment of his peers, from his lands, castles, franchises, or from his right, we will immediately restore them to him; and if a dispute arise over this, then let it be decided by the five and twenty jurors of whom mention is made below in the clause for securing the peace. Moreover, for all those possessions, from which anyone has, without the lawful judgment of his peers, been disseized or removed by our government, we will immediately grant full justice therein. Magna Carta Paragraph 52.

³ "A Court of Record is a judicial tribunal having attributes and exercising functions independently of the person of the magistrate designated generally to hold it, and proceeding according to the course of common law, its acts and proceedings being enrolled for a perpetual memorial." Jones v. Jones, 188 Mo.App. 220, 175 S.W. 227, 229; Ex parte Gladhill, 8 Metc. Mass., 171, per Shaw, C.J. See, also, Ledwith v. Rosalsky, 244 N.Y. 406, 155 N.E. 688, 689.

In law, standing or locus standi⁴ is the term for the ability of a party to demonstrate to the court sufficient connection to and harm from the law or action challenged to support that party's participation in the case. Standing exists from one of three causes:

- 1) SOMETHING TO LOSE DOCTRINE: The party is directly subject to an adverse effect by the statute or action in question, and the harm suffered will continue unless the court grants relief in the form of damages or a finding that the law either does not apply to the party or that the law is void or can be nullified. This is called the "*something to lose doctrine*", in which the party has standing because they directly will be harmed by the conditions for which they are asking the court for relief.
- 2) CHILLING EFFECTS DOCTRINE: The party is not directly harmed by the conditions by which they are petitioning the court for relief, but asks for it because the harm involved has some reasonable relation to their situation, and the continued existence of the harm may affect others who might not be able to ask a court for relief. In the United States, this is the grounds for asking for a law to be struck down as violating the First Amendment, because while the plaintiff might not be directly affected, the law might so adversely affect others that one might never know what was not done or created by those who fear they would become subject to the law – the so-called "*chilling effects doctrine*".
- 3) ACT OF LAW: The party is granted automatic standing by act of law.⁵

In a Republic such as ours, the unalienable right(s) of the one trumps the will of the whole of society. If one or more of the blessings of liberty⁶ is in imminent danger of loss by one, they have the unalienable right of due process to secure that right(s). The defendants in the case before this court threaten the rights of both the one and the whole of society.

The Declaration of Independence was initiated by 56 People, the Constitution for the United States of America was initiated by 39 People and this Restoration of that Declaration and Constitution is herein initiated by more than 6,000 Grand Jurists a/k/a the "Sureties" of the Peace, on behalf of themselves, on behalf of those unable to articulate their case before the court and on behalf of the deceived that have been lulled to sleep by

⁴ LOCUS STANDI: A place of standing; standing in court. A right of appearance in a court of justice, or before a legislative body, on a given

⁵ Lee, Evan; Mason Ellis, Josephine (December 3, 2012). "The Standing Doctrine's Dirty Little Secret". Northwestern Law Review. 107: 169. SSRN 2027130Freely accessible.

⁶ We the people of the United States, in order to form a more perfect union, establish justice, insure domestic tranquility, provide for the common defense, promote the general welfare, and secure the blessings of liberty to ourselves and our posterity, do ordain and establish this Constitution for the United States of America.

the orchestrators of treachery. We are 110 jurists from Alabama, 41 jurists from Alaska, 217 jurists from Arizona, 47 jurists from Arkansas, 581 jurists from California, 171 jurists from Colorado, 110 jurists from Connecticut, 21 jurists from Delaware, 505 jurists from Florida, 172 jurists from Georgia, 57 jurists from Hawaii, 94 jurists from Idaho, 177 jurists from Illinois, 113 jurists from Indiana, 44 jurists from Iowa, 56 jurists from Kansas, 67 jurists from Kentucky, 73 jurists from Louisiana, 50 jurists from Maine, 112 jurists from Maryland, 81 jurists from Massachusetts, 268 jurists from Michigan, 82 jurists from Minnesota, 42 jurists from Mississippi, 115 jurists from Missouri, 68 jurists from Montana, 54 jurists from Nebraska, 75 jurists from Nevada, 56 jurists from New Hampshire, 117 jurists from New Jersey, 61 jurists from New Mexico, 439 jurists from New York, 206 jurists from North Carolina, 27 jurists from North Dakota, 165 jurists from Ohio, 72 jurists from Oklahoma, 147 jurists from Oregon, 306 jurists from Pennsylvania, 24 jurists from Rhode Island, 95 jurists from South Carolina, 41 jurists from South Dakota, 119 jurists from Tennessee, 401 jurists from Texas, 116 jurists from Utah, 24 jurists from Vermont, 120 jurists from Virginia, 273 jurists from Washington, 45 jurists from West Virginia, 107 jurists from Wisconsin and 56 jurists from Wyoming. Simply said, we are “~~We~~ the ~~Resolved~~ ~~People~~ of the ~~United~~ ~~States~~ of ~~America~~” and “We are here to take back Our Republic”, courts of fiction notwithstanding.

65 In fulfillment of the “*something to lose doctrine*,” ~~We~~ the ~~Resolved~~ ~~People~~ are in jeopardy of losing our unalienable rights to tyrants who refuse to answer.

In fulfillment of the “*chilling effects doctrine*,” ~~We~~ the ~~Resolved~~ ~~People~~ are unjustly jailed; denied due process in courts of law; unconstitutionally taxed; tried in jurisdictions unknown; spied upon through our phones, TV’s, cars, emails and cameras everywhere; our children are stolen; our parents are robbed of the fruits of their life’s labors and enjoyment of their twilight years and we are robbed of our homes by detestable non-judicial foreclosures to name just a few.

75 In fulfillment of an “Act of Law” our founding fathers “*expressed a desire, in order to prevent misconstruction or abuse of its powers, that further declaratory and restrictive clauses should be added: And as extending the ground of public confidence in the Government, will best ensure the beneficent ends of its institution*”⁷ and thereby added to the Constitution a Bill of Prohibition being an Act of Law whereby ~~We~~ the ~~Resolved~~ ~~People~~ have declared and here today reiterate our standing.

⁷ Bill of Rights.

CONCLUSION: We the Sovereign People have unalienable rights under the Laws of
80 Natures God, a/k/a Common Law. We the People are not bound by statutes, codes or
regulations. Congress has no authority to codify and license our rights and no court has the
authority to enforce such repugnant statutes. We the Sovereign People provided for
ourselves, through the Constitution, Courts of Justice called Article III Courts, where We
the People have Standing whether we are one or a thousand. Since Congress doesn't have
85 the backbone to start removing these seditious judges, acting in bad behavior, through
impeachment for robbing the People of their Standing, due process and Article III Courts
of Record they will in due time suffer the wrath of We the Sovereign People through
indictments and judgments in Courts of Record.

90 SEAL

Dated April 17, 2017


95 Grand Jury Foreman